

Appointment

From: Dina Johnson [DLJohnson@environcorp.com]
Sent: 4/14/2014 6:21:43 PM
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CC: Holland, Shannon (St. James Healthcare) [Shannon.Holland@sclhs.net]
Subject: Review Public Comments on Butte Health Study
Attachments: David Sironi Comments Compiled.pdf; John Ray Comments Compiled.pdf; Steve Ackerlund Comments.pdf; Written comment from 040914 public meeting.pdf; John Ray Comments Compiled.docx; Comment Summary_general themes_prelim050914.xlsx; Prior Responses to Similar Comments.docx
Location: 1-877-668-4493 Access: 23230191
Start: 5/12/2014 5:00:00 PM
End: 5/12/2014 6:30:00 PM
Show Time As: Tentative
Recurrence: (none)

As promised, additional materials for review and discussion during our call Monday are attached. The "John Ray Comments Compiled" MS Word file includes comment bubbles with initial thoughts about response development. The MS Excel file summarizes the location and nature of specific comments by John Ray that fall into a few general themes (e.g., environmental justice). And the "Prior Responses to Similar Comments" MS Word file includes pasted text from EPA's responsiveness summary for the BPSOU ROD that may be useful in development of responses to similar comments received for the current study. ~Dina

Hello Working Group and CAC members:

In preparation for our call on Monday, attached are comments received on the draft final report through April 29, 2014 (the close of the public comment period). The majority of comments received were submitted by John Ray in 19 separate submittals. In addition, four other comment submittals were received, including the ones suggesting changes to the preface/public health study that were submitted by Steve Ackerlund just prior to release of the draft final report. We are working on compiling some preliminary response bullets/notes for discussion during Monday's call. We will distribute those prior to the call on Monday along with copies of EPA responses to many of the similar comments received from John Ray in relation to the BPSOU ROD. The Ray comment submitted during the health study public comment period focused largely on environmental justice considerations (in general as well as specific to the study) and the need for an independent peer review of the draft final study prior to finalizing it. Other comments from John Ray pertained to site action levels, prior studies, precautionary principal, the Barry study, etc. as well as a variety of "methodological" issues with the draft final health study. With regard to the methodological concerns, none were specifically linked to actual study methods used and most are not relevant, even generally, to the purpose or nature of the study we conducted. In these cases, we expect that many of our responses will be addressed by the proposed response to one of his comments about the study purpose, which I've included for your consideration below:

Comment: "What exactly, in as succinct a statement as possible, is the purpose of Phase 1 of the Health Study?"

Proposed Response: "The purpose of the Phase 1 study is described on pages ii, xv, and 1 of the February 2014 Draft Final Report. For clarity, the purpose is also summarized below.

The purpose of the Phase 1 Superfund study is to evaluate the effectiveness of ongoing remediation and residential metals abatement efforts in the study area that have occurred since the early 1990s and to identify areas of potential

improvements to current remediation/abatement approaches based on that evaluation. Toward that end, the EPA-approved study design focuses on assessing lead exposures represented by several years (2003 through 2011) of available blood lead data collected from Butte children.

Specifically, this study employs a descriptive cross-sectional analysis of blood lead data and other factors that may influence blood lead levels in children to characterize the following:

- how Butte blood lead levels represented in the available data have changed over this time period,
- how blood lead levels in the Butte study population compare to blood lead levels for a demographically-similar reference dataset that does not have Butte's Superfund history, and
- what factors in Butte might be contributing to differences in blood lead levels across the Butte study population and between Butte study population and the reference blood lead dataset.

Other available RMAP data for the same study period are considered in the study, secondary to the primary analyses of blood lead data. Recommendations are included regarding potential improvements to current remediation/abatement approaches that may be indicated based on interpretation of the results from these analyses.

To further assure clarity regarding the study purpose, we also note that the purpose of this study was not to address questions of causality or to evaluate health outcomes associated with the blood lead levels characterized for the Butte study population. Therefore, methodological concerns or comments related to causation studies or health outcome studies are not relevant to this study and are not addressed in this response to comment document."

Thank you and we look forward to speaking with you all soon.

Dina



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